REMARKS

The Office Action dated July 23, 2008, has been received and carefully noted. The above amendments to the claims, and the following remarks, are submitted as a full and complete response thereto.

Claims 1-11, 15, and 21-27 are currently pending in the application, of which claims 1, 9, 11, and 15 are independent claims. Claims 12-14 have been cancelled without prejudice or disclaimer. Entry of the amendments is respectfully requested on the basis that the amendments simply the issues presented for appeal, or alternatively place the application in condition for allowance. Claims 1-11, 15, and 21-27 are respectfully submitted for consideration.

The Office Action objected to the specification, alleging that it "fail[s] to provide proper antecedent basis for the claimed subject matter," and citing 37 C.F.R. 1.75(d)(1) and MPEP 608.01(o). The Office Action stated that claim 12 in the preamble recites a computer-readable medium. The Office Action, in asserting that the specification fails to provide antecedent basis for the terms of the claim, appears to have overlooked that both 37 CFR 1.78(d)(1) and MPEP 608.01(o) state: "clear support **or** antecedent basis." (emphasis added) Thus, clear support in the specification is adequate under 37 CFR 1.75(d)(1), and there is no absolute requirement that antecedent basis be present. There is clear support for the features of claim 12 in the specification as originally filed. Furthermore, without prejudice or disclaimer, claim 12 has been cancelled. Accordingly, it is respectfully requested that the objection be withdrawn.

Claim 13 was rejected under 35 U.S.C. 101 as lacking the necessary physical articles or objects to constitute a machine or a manufacture under 35 U.S.C. 101. Applicants respectfully traverse this rejection.

Claim 13 was directed to a system that includes both a receiver and a transmitter. Both a receiver and a transmitter constitute necessary physical articles or objects to constitute a machine or manufacture under 35 U.S.C. 101. The Office Action simply asserted, without supporting evidence or legal precedent, that receiver, transmitter, and converter "may still simply be names applied to software elements." This assertion, since it is unsupported by substantial evidence or legal precedent qualifies as "arbitrary and capricious" under and therefore invalid under the Administrative Procedure Act (5 U.S.C. § 706), a standard to which all Actions by the USPTO must adhere (*see Dickenson v. Zurko*, 527 U.S. 150 (1999). Furthermore, without prejudice or disclaimer, claim 13 has been cancelled together with claim 14, which depended from it. Accordingly, the rejection must be withdrawn.

Claims 1-2, 8-15, 21, and 27 were rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,557,045 of Tsukui et al. ("Tsukui"). Applicants respectfully traverse this rejection.

Claim 1, upon which claims 2-8 depend, is directed to a method including receiving data to be supplied to database operations, the data including at least one Internet domain name comprising a plurality of successive labels separated by dots. The at least one Internet domain name being in a first format. The at least one Internet domain

name comprises at least one hostname and at least one top-level domain name. The method also includes conditionally converting at least one of the at least one Internet domain name into a second format of Internet domain name in which at least two successive labels of the at least one of the at least one Internet domain name are combined to form a single label. The conditionally converting comprises converting the Internet domain name when the Internet domain name fulfills a predetermined condition. The method further includes supplying the data to the database operations, the supplied data including at least one Internet domain name in the second format.

Claim 9, upon which claim 10 depends, is directed to a system including receiving means for receiving data to be supplied to database operations. The data includes at least one Internet domain name comprising a plurality of successive labels separated by dots. The at least one Internet domain name is in a first format; the at least one Internet domain name comprises at least one hostname and at least one top-level domain name. The system also includes converting means for conditionally converting at least one of the at least one Internet domain name into a second format of Internet domain name in which at least two successive labels of the at least one of the at least one Internet domain name are combined to form a single label. The second means is configured to convert the Internet domain name when the Internet domain name fulfills a predetermined condition. The system further includes supplying means for supplying the data to database operations, the supplied data including at least one Internet domain name in the second format.

Claim 11, upon which claims 21-27 depend, is directed to an apparatus including a first interface configured to receive data to be supplied to database operations. The data includes at least one Internet domain name comprising a plurality of successive labels separated by dots. The at least one Internet domain name being in a first format, wherein the at least one Internet domain name comprises at least one hostname and at least one top-level domain name. The apparatus also includes a converter configured to conditionally convert at least one of the at least one Internet domain name into a second format of Internet domain name in which at least two successive labels of the at least one of the at least one Internet domain name form a single label, wherein the modification module is configured to convert the Internet domain name when the Internet domain name fulfills a predetermined condition. The apparatus further includes a second interface configured to supply the data to database operations, the supplied data including at least one Internet domain name in the second format.

Claims 12-14 have been cancelled without prejudice or disclaimer, and consequently their rejection is moot and should be withdrawn at least for that reasons, in addition to the reasons discussed below.

Claim 15 is directed to an apparatus including first interface means for receiving data to be supplied to database operations. The data includes at least one Internet domain name comprising a plurality of successive labels separated by dots. The at least one Internet domain name being in a first format. The at least one Internet domain name comprises at least one hostname and at least one top-level domain name. The apparatus

also includes modification means for conditionally converting at least one of said at least one Internet domain name into a second format of Internet domain name in which at least two successive labels of the at least one of said at least one Internet domain name form a single label. The modification means is configured to conditionally convert the Internet domain name when the Internet domain name fulfills a predetermined condition. The apparatus further includes second interface means for supplying the data to database operations, the supplied data including at least one Internet domain name in the second format.

Applicants respectfully submit that Tsukui fails to disclose or suggest all of the elements of any of the presently pending claims.

Tsukui generally relates to an apparatus for editing an e-mail address and an e-mail apparatus. The e-mail apparatus of Tsukui includes a memory to which a character string showing a domain name is stored, and a display for dividing an e-mail address into several segments including a segment of the domain name so as to be displayed, and for displaying the character string of the domain name stored in the memory at the segment of the domain name. The apparatus also includes a button for changing the domain name displayed on the display to other domain name stored in the memory and a dividing section, which is configured to divide the character string of the e-mail as a sender included in the received e-mail into a plurality of segments. The apparatus also includes a storing section, which is configured to store the character string corresponding to the segment of at least the domain name in the divided character, to the memory.

Claim 1 recites, in part, "receiving data to be supplied to database operations, the data including at least one Internet domain name comprising a plurality of successive labels separated by dots, said at least one Internet domain name being in a first format, wherein the at least one Internet domain name comprises at least one hostname and at least one top-level domain name." Tsukui fails to disclose or suggest at least these features of claim 1.

Tsukui fails to disclose receiving any data to be supplied to **database operations**. In fact, Tsukui fails to disclose any database or operations pertaining to databases. It should be noted that *e.g.* the edition RAM 104 of Tsukui simply provides a work area for editing an e-mail address (as explained at column 3, lines 15-16, of Tsukui). Thus, edition RAM 104 of Tsukui corresponds to a regular, conventional random access memory of a computer apparatus, which – as such – does not constitute any kind of database.

Claim 1 also recites, in part, "conditionally converting at least one of said at least one Internet domain name into a second format of Internet domain name in which at least two successive labels of the at least one of said at least one Internet domain name are combined to form a single label." Tsukui also fails to disclose or suggest at least these features of claim 1.

Tsukui fails to disclose or suggest such conditionally converting an Internet domain name into a second format of Internet domain name in which at least two successive labels of the Internet domain name are combined to form a single label. In

particular, **Tsukui fails to teach converting** an Internet domain name into a second format **such that at least two successive labels of the Internet domain name are combined to form a single label**.

The Office Action cited column 4, lines 3-65, and Figure 3 of Tsukui. However, there is no disclosure, whatsoever, of a conversion in which two or more successive labels of an Internet domain name of first format would be combined to form a single label of an Internet domain name of second format. Instead, *e.g.* in Figure 3 of Tsukui discusses how to divide an e-mail address into predetermined segments (column 3, lines 64-66). In the process of Tsukui, the address is examined segment by segment by comparing the extracted segments into stored in the backup RAM to find out if the extracted character string is stored in the backup RAM. But, in this process of Tsukui:

1) **No two labels are combined to form a single label**. For example, separate labels "co" and "jp" separated by a dot (*i.e.* "co.jp") **stay as separate labels** (*i.e.* as "co.jp"; *see* column 4 and Figure 4 of Tsukui) in the process of Figure 3; they are not combined to form a single label.

2) **There is no conversion of an Internet domain name of a first format into a second format** in Figure 3 of Tsukui. Instead, only e-mail address segments are extracted for comparison purposes but they, or the complete e-mail address, are not converted into any second format. Even if some segments were stored separately, they would still not constitute the original address in a second format but only incomplete parts of the original address still in the first format.

Claim 1 further recites, in part, "wherein the conditionally converting comprises converting the Internet domain name when the Internet domain name fulfills a predetermined condition." Tsukui fails to disclose or suggest these features of claim 1.

As already explained above, there is no disclosure in Tsukui of converting an Internet domain name. Thus, Tsukui also fails to disclose such conditional converting.

Claim 1 additionally recites, in part, "supplying the data to the database operations, the supplied data including at least one Internet domain name in the second format." Tsukui fails to disclose or suggest these features of claim 1.

Tsukui fails to suggest supplying any data to any database operations. In addition, as mentioned above, there is no second format of Internet domain name disclosed in Tsukui.

The Office Action cited column 5, lines 40-50, of Tsukui with respect to these features. In this cited paragraph, Tsukui explains how an extracted e-mail can be stored in a divided manner into backup RAM 106. However, the backup RAM is merely a random access memory and as such does not correspond to a database, as has been discussed above. Furthermore, there is no mention of any database operations in Tsukui. Finally, the e-mail address stored in the backup RAM 106 is not in any second format but is still in the original format. The fact that the address may be stored divisionally (or in a divided manner) does not change the address format *per se*. For example, the e-mail address tsukui@rdmg.mgcs.mei.co.jp would retain its format even if it is stored

divisionally because no part of the original address is changed during the storing process according to Tsukui.

Accordingly, for the reasons stated above, it is respectfully submitted that Tsukui fails to disclose or suggest all of the elements of claim 1. Independent claims 9, 11, and 15 (as well as previously pending independent claims 12-13) each have their own respective scope, but each recite at least some similar features to those discussed above with respect to claim 1. Claims 2, 8, 10, 21, and 27 depend respectively from, and further limit, claims 1, 9, and 11. Claims 12-14 have been cancelled without prejudice disclaimer. Thus, it is respectfully requested that the rejection of each of claims 1-2, 8-15, 21, and 27 be withdrawn.

Claims 3-5 and 22-24 were rejected under 35 U.S.C. 103(a) as being unpatentable over Tsukui in view of U.S. Patent No. 6,963,928 of Bagley et al. ("Bagley"). The Office Action acknowledged that certain features of the rejected claims are not disclosed by Tsukui and consequently cited Bagley. Applicants respectfully traverse this rejection.

Claims 3-5 and 22-24 depend respectively from, and further limit, claims 1 and 11. At least some of the deficiencies of Tsukui with respect to claims 1 and 11 are provided above. Bagley does not remedy the above-identified deficiencies of Tsukui, and consequently the combination of Tsukui and Bagley fails to disclose or suggest all of the elements of any of the presently pending claims.

Bagley generally relates to systems and methods for communicating across various communication applications using single address strings. Thus, it is unsurprising

that Bagley cannot remedy the above-identified deficiencies of Tsukui. Nevertheless, since Bagley does not remedy the above-identified deficiencies of Tsukui, the combination of Tsukui and Bagley fails to disclose or suggest all of the elements of claims 3-5 and 22-24 and it is respectfully requested that the rejection of claims 3-5 and 22-24 be withdrawn.

Claims 6-7 and 25-26 were rejected under 35 U.S.C. 103(a) as being unpatentable over Tsukui in view of Bagley and further in view of U.S. Patent Application Publication No. 2003/0007482 of Khello et al. ("Khello"). The Office Action acknowledged that certain features of the rejected claims are not disclosed by the combination of Tsukui and Bagley and consequently cited Khello. Applicants respectfully traverse this rejection.

Claims 6-7 and 25-26 depend respectively from, and further limit, claims 1 and 11. At least some of the deficiencies of Tsukui with respect to claims 1 and 11 are discussed above. Khello does not remedy the above-identified deficiencies of the combination of Tsukui and Bagley and consequently the combination of Tsukui, Bagley, and Khello fails to disclose or suggest all of the elements of any of the presently pending claims.

Khello generally relates to a method and apparatus for resolving an entity identifier into an internet address using a domain name system (DNS) server and an entity identifier portability database. As explained at paragraph [0055], Khello suggests that a user A may enter an E.164 telephone number for user B into his user equipment. The user equipment may then generate a query. After various processing in the network, a DNS server may access its mobile number portability database which includes B's

telephone number, and forward a corresponding IP address along with B's telephone number back to A's user equipment. As Khello explains at the end of paragraph 0055, this whole process may be performed so that a game may be played between users A and B.

Khello fails to disclose or suggest all of the elements of any of the presently pending claims. For example, Khello fails to disclose or suggest "conditionally converting at least one of said at least one Internet domain name into **a second format of Internet domain name** in which at least two successive labels of the at least one of said at least one Internet domain name are combined to form a single label," (emphasis added) as recited in claim 1, or the similar recitations of independent claims 9, 11-13, or 15 (each of which has its own respective scope). In Khello there is no conversion **into** any format of Internet domain name, but in Khello an E.164 is merely *extracted from* the original Internet domain name. That is to say, in Khello the original Internet domain name as such is *not* actually *converted into* another format, and certainly is not converted into another format of Internet domain name, even if it could be said (not admitted), that Khello's "Internet domain name" is converted into a format of some other kind or that Khello's E.164 number is converted into a format of "Internet domain name."

Other distinctions between Khello and the claims are already of record, and have been set forth, for example, in the Response filed April 21, 2008. Accordingly, it is apparent that Khello, like Tsukui fails to disclose or suggest the features with respect to the combination of Tsukui and Bagley is deficient. Thus, claims 6-7 and 25-26 recite

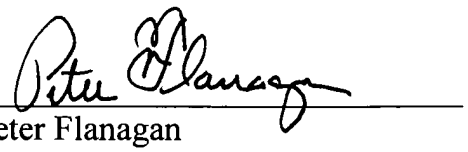
subject matter that is neither disclosed nor suggested in the combination of Tsukui, Bagley, and Khello and consequently it is respectfully requested that the rejection of claims 6-7 and 25-26 be withdrawn.

For the reasons set forth above, it is respectfully submitted that each of claims 1-11, 15, and 21-27 recites subject matter that is neither disclosed nor suggested in the cited art. It is, therefore, respectfully requested that all of claims 1-11, 15, and 21-27 be allowed and that this application be passed to issuance.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, Applicants' undersigned representative at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, Applicants respectfully petition for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,



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